

49D12-2203-CT-009127

Filed: 3/21/2022 12:54 PM

Marion Superior Court 12

Clerk
Marion County, Indiana

STATE OF INDIANA)	IN THE MARION COUNTY CIRCUIT/SUPERIOR COURT
)	SS:
COUNTY OF MARION)	CAUSE NO:
TAYLOR BUTLER)	
)	
Plaintiff,)	
)	
vs.)	
)	
SPEEDWAY LLC)	
)	
Defendant,)	

COMPLAINT FOR DAMAGES

Comes now the Plaintiff, Taylor Butler, by counsel, and for her cause of action, respectfully states as follows:

1. That Defendant Speedway LLC, Inc. is a corporation doing business in the State of Indiana;
2. That Defendant Speedway LLC owns, manages, maintains, and operates a business location located at 5960 S. East Street, Indianapolis, Marion County, Indiana;
3. That on January 08, 2022 Taylor Butler was a business invitee of the Defendant;
4. That Defendant Speedway LLC owed all business invitees in general and Taylor Butler, in particular, the duty to use reasonable care in the operation of its business;
5. The Defendant Speedway LLC breached its duty of care in one or more of the following respects:
 - (a) Negligently failing to properly maintain its premises in a reasonably safe condition; and
 - (b) Failing to properly clear hazardous conditions from its premises, despite county-wide winter weather advisories.

6. That on January 8, 2022, as a result of the defective condition of Defendant's premises, Plaintiff Taylor Butler slipped on ice on the premises and sustained severe injuries; and

7. That as a result of the negligence of Defendant Speedway LLC, and the resulting injuries, Plaintiff Taylor Butler incurred medical expenses, lost earnings, and pain and suffering and may have sustained a permanent condition which may result in future medical expenses, future pain and suffering, future lost wages, impaired earning capacity, disability, and loss of ability to function as a whole person.

WHEREFORE, the Plaintiffs pray for judgment in an amount as is reasonable in the premises against the Defendant Speedway LLC for costs of this action, and for all other just and proper relief in the premises.

Respectfully submitted,

/s/ Steven E. Willsey
Steven E. Willsey, #2079-41

DEMAND FOR TRIAL BY JURY

Comes now the Plaintiff, by counsel, and demands a trial by Jury.

/s/ Steven E. Willsey
Steven E. Willsey, #2079-41
Attorney for Plaintiff

Steven E. Willsey, Attorney at Law
6435 S. East Street, Suite A
Indianapolis, IN 46227